



Richard T. Ellis
Director – Federal Regulatory Advocacy

December 17, 2003

1300 I Street, NW
Suite 400 West
Washington, DC 20005
(202) 515-2534
(202) 336-7922 (fax)

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th H Street, SW, Portals
Washington, DC 20554

Re: Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers and Verizon Petition for Forbearance from Application of Section 271 – CC Docket No. 01-338; Implementation of the Local Competition Provisions in the Telecommunications Act of 1996 - CC Docket No. 96-98; Deployment of Wireline Services Offering Advanced Telecommunications Capability – CC Docket No. 98-147

Dear Ms. Dortch:

On December 17, 2003, Richard Ellis, Jerome Holland, Ann Rakestraw, Scott Randolph, and Michael O'Connor of Verizon met with Pam Arluk, Michelle Carey, Marcus Maher, Tom Navin, and Brent Olson of the FCC to discuss Verizon's plans for deployment of fiber to the premises.

The attached handout covers the major points of discussion.

If you have any questions about this matter, please do not hesitate to contact me on 202-515-2534.

Sincerely,

A handwritten signature in black ink that reads "Richard T. Ellis".

cc: P. Arluk
M. Carey
M. Maher
T. Navin
B. Olson



FTTP Overview
December 17, 2003

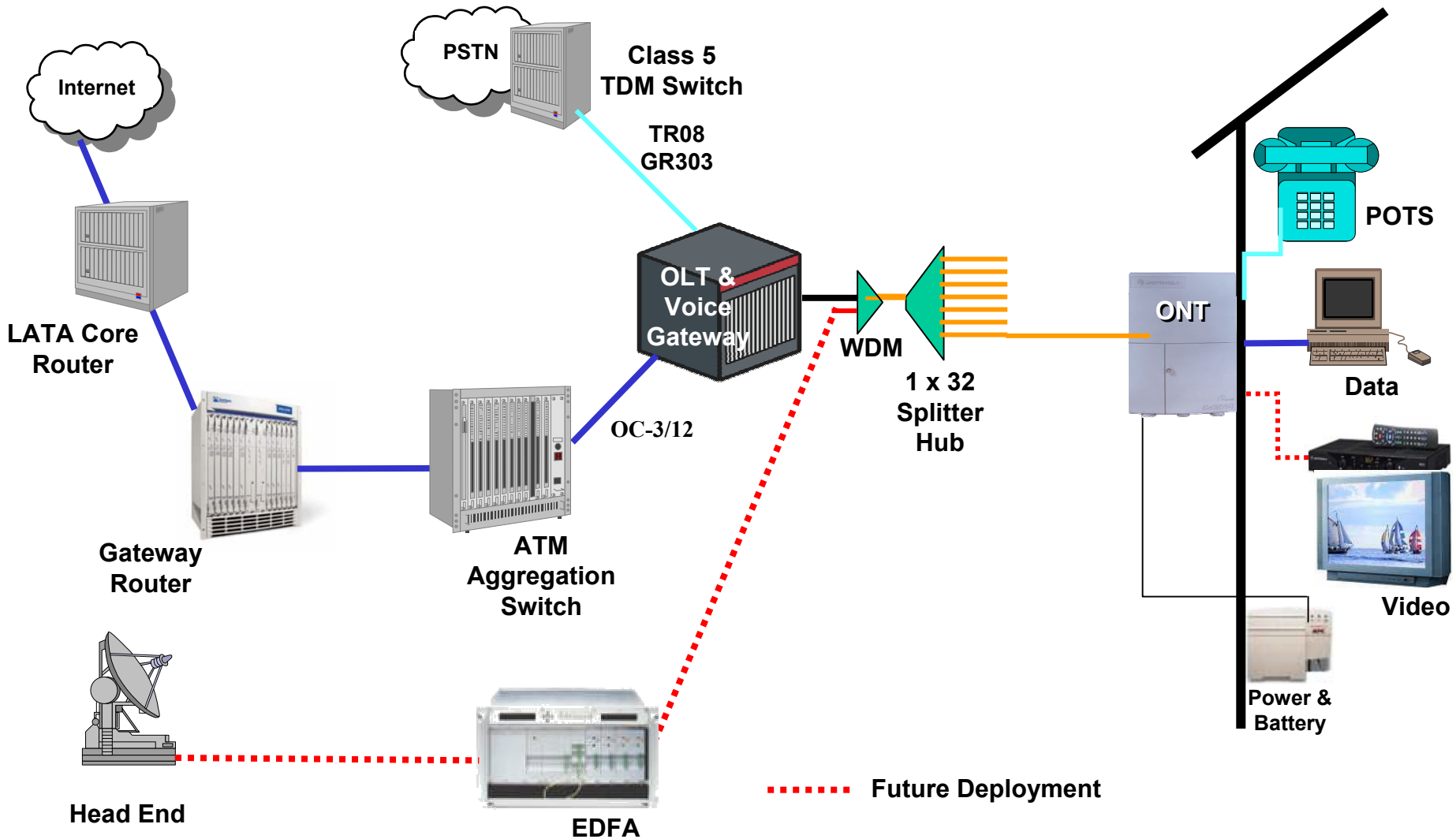
Promise of FTTP Means ...

- ✓ **A New Customer Experience**
- ✓ **New Products**
- ✓ **New Processes & Systems**
- ✓ **A New Network**

FTTP Reference Architecture



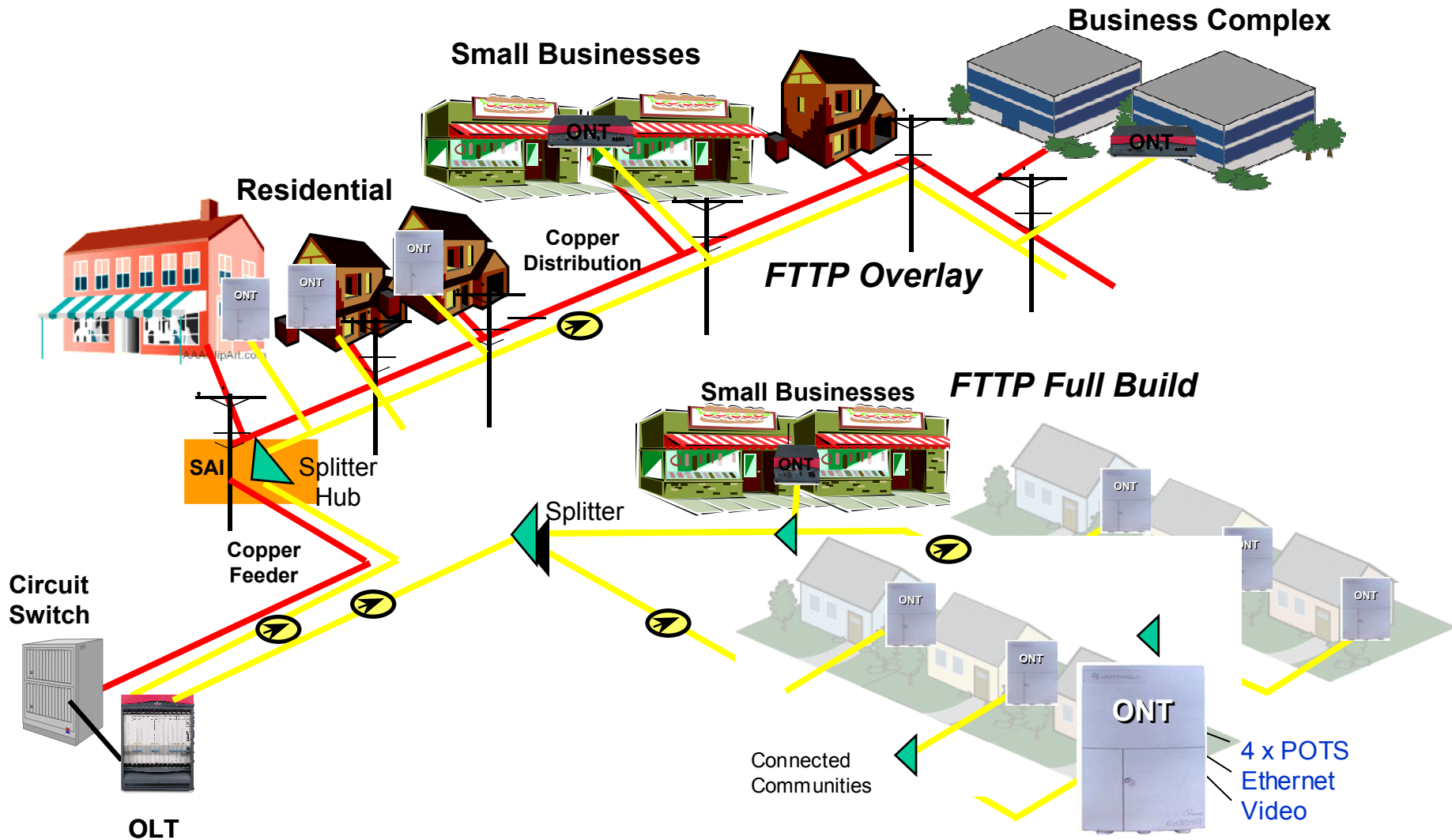
Fiber to the Premises



FTTP Full Build & Overlay Architectures



Fiber to the Premises



◆ 2004 Goals

- ✓ Pass 1M Households
 - Objective is substantial coverage within 5 years
- ✓ Build out 100 Central Offices in 9 States

The Promise of FTTP is Based on ...



Fiber to the Premises

... the Following Assumptions:

- ✓ **No unbundling requirements for the FTTP Network, including no separate FTTP unbundling obligations under Section 271.**
- ✓ **Deployment of FTTP fiber to Multi-unit premises will be treated like other FTTP locations, regardless of who owns intrabuilding copper wiring.**
- ✓ **A clear definition of a “mass market” customer exists.**
 - Suggestion: Mass market = any customer with up to 48TNs.

The Basis for These Assumptions:



Fiber to the Premises

- ✓ **No unbundling requirements for the FTTP Network**
 - Distribution and feeder network is a complete overbuild (Where copper already exists).
 - Do not know how to unbundle FTTP passive optical network.
- ✓ **Multi-unit premises treated like other FTTP locations**
 - Many MUPs are treated same as single-family units for network creation today.
 - Will still provide access to copper intrabuilding cabling owned/controlled by ILEC.
- ✓ **A clear definition of a “mass market” customer**
 - *No operational definition exists today.*
 - *48 TNs is a reasonable breakpoint (equiv. of approx. two DS-1's)*